IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

CAL IV ENTERTAINMENT, LLC,)
on behalf of itself and all others similarly)
situated,)
)
Plaintiffs,)
)
v.) No. 3:07-CV-00617
)
YOUTUBE, INC., YOUTUBE, LLC,) Judge Echols
and GOOGLE, INC.,) Magistrate-Judge Bryant
)
Defendants.)

<u>DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME</u> <u>TO RESPOND TO COMPLAINT</u>

Defendants YouTube, Inc. et al. ("YouTube") respectfully move this Court for an extension of time to respond to Plaintiff's Complaint. In support of this Motion, YouTube states as follows:

- 1. YouTube received the Complaint on or about June 13, 2007. That receipt places the response deadline on July 3, 2007.
- 2. The undersigned counsel recently has been retained as local counsel, and is working with lead counsel for the Defendants.
- 3. This is YouTube's first request for an extension of time to respond to the Plaintiff's 32-page Class Action Complaint. YouTube requests additional time in order to be able appropriately to respond. The undersigned counsel has obtained the consent of Plaintiff's counsel to the requested extension.

WHEREFORE, for the foregoing reasons, YouTube respectfully moves this Court for an extension of time, through and including July 24, 2007, to answer or otherwise respond to the Plaintiff's Complaint. A proposed Order has been submitted with this Motion.

Respectfully submitted,

/s/ Robb S. Harvey

James M. Doran (Tenn. BPR No. 2638)
Robb S. Harvey (Tenn. BPR No. 11519)
WALLER LANSDEN DORTCH & DAVIS LLP
511 Union Street, Suite 2700
Nashville, TN 37219
(615) 244-6380
E-mail: jdoran@wallerlaw.com &

rharvey@wallerlaw.com
Local Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on June 28, 2007, a true and correct copy of the foregoing document was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system. Parties/counsel who are to receive service include:

Gerald E. Martin BARRETT, JOHNSTON & PARSLEY 217 Second Avenue North Nashville, Tennessee 37201 615/244-2202 Email: jmartin@barrettjohnston.com

Daniel C. Girard Girard Gibbs LLP 601 California Street, 14th Floor San Francisco, California 94108 415/981-4800

Email: dcg@girardgibbs.com

Kevin Doherty BURR & FORMAN 700 Two American Center 3102 West End Center Nashville, Tennessee 37203 615/724-3211 Email: kdoherty@burr.com

/s/Robb S. Harvey
Counsel for Defendant

1556657.1